

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate	)	CG Docket No. 17-59
Unlawful Robocalls	)	

**REPLY COMMENTS OF AT&T**

AT&T Services, Inc., on behalf of itself and its affiliates (collectively, “AT&T”), submits these reply comments in response to the Federal Communications Commission’s (“Commission”) Sixth Further Notice of Proposed Rulemaking in the above-referenced docket (“*Further Notice*”) regarding the best long-term approach to immediate notification of blocking.<sup>1</sup>

**I. SIP CODE 603 IS A REASONABLE SOLUTION TO PROVIDE CALLING PARTIES WITH ACTIONABLE INFORMATION**

AT&T agrees with commenters that the TRACED Act requires that robocall services are “provided with transparency and effective redress” when calls are blocked.<sup>2</sup> The TRACED Act, however, does not dictate how voice service providers should provide notification when calls are blocked by the terminating provider, and does not dictate the implementation of SIP Codes 607 and 608. As discussed by other commenters, SIP Code 603 is a pragmatic and effective means of providing immediate notification that a call was blocked due to a voice service provider’s use

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<sup>1</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls – Petition for Reconsideration and Request for Clarification of USTelecom – The Broadband Association*, CG Docket No. 17-59, Order on Reconsideration, Sixth Further Notice of Proposed Rulemaking, and Waiver Order, FCC 21-126 (rel. Dec. 14, 2021) (“*Reconsideration Order*” when referring to the Order on Reconsideration and “*Further Notice*” when referring to the Sixth Further Notice of Proposed Rulemaking).

<sup>2</sup> See, e.g., Comments of the American Bankers Association et al (“ABA”), p.4; Comments of the National Opinion Research Center (“NORC”), p.2.

of analytics to identify illegal robocalls, thus enabling the caller to seek redress for legitimate calls that are inadvertently blocked.<sup>3</sup>

As discussed by commenters, SIP Code 603 has already been implemented in voice service provider networks and mapping has already been established between IP and TDM networks.<sup>4</sup> Some commenters argue that SIP Code 603 does not provide sufficient actionable information to enable callers to seek redress.<sup>5</sup> However, as explained by USTelecom, “in context SIP Code 603 responses will help callers and their service providers identify an issue.”<sup>6</sup> In addition, as discussed by Transaction Network Service, “the industry is exploring enhancements to SIP Code 603 that will provide additional actionable information with the response code.”<sup>7</sup> In fact, AT&T has already added information to the SIP Code 603 reason header to provide actionable information to the calling party. Indeed, at least one proponent of SIP Codes 607/608 recognizes that “changes to the SIP 603 could make the code more actionable in the future.”<sup>8</sup>

To that end, AT&T strongly supports the development of a standardized message in the reason header for use across the industry to indicate when a call has been blocked by analytics. As USTelecom observes, “the SIP Code 603 standard can be modified to include standardized information in the header that distinguishes between analytics-based blocking and other call declination and then deployed in a far shorter timeline than it would take to revise, finalize,

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<sup>3</sup> Comments of Transaction Network Services (“TNS”), p. 3; Comments of USTelecom (filed January 31, 2022), p. 1-2.

<sup>4</sup> *See, e.g.*, TNS Comments, p. 4

<sup>5</sup> *See, e.g.*, Comment of Professional Association for Customer Engagement (“PACE”), p.1-2; ABA, p. 8; Comments of the Voice on the Net Coalition (“VON”), p.1.

<sup>6</sup> USTelecom, Written Ex Parte Presentation, CG Docket No. 17-59 (filed Oct. 7, 2021), p.2-3.

<sup>7</sup> TNS Comments, p. 4; *see also*, USTelecom Comments, p. 2 (“USTelecom and its members also continue to engage the calling community and explore if and how SIP Code 603 can be modified to provide better information to the callers.”)

<sup>8</sup> ABA Comments, p.8

operationalize, and ultimately deploy SIP Codes 607 and 608.”<sup>9</sup> AT&T is committed to engaging with the calling community and ATIS/SIP Forum IP-NNI Task Force, and exploring if and how the reason header for SIP Code 603 can be standardized to provide the calling community with better information.

Despite contrary views from some commenters,<sup>10</sup> AT&T strongly believes that a standardized message in the reason header with SIP Code 603 can be implemented much quicker than SIP Codes 607/608 and with less disruption to the interoperable voice calling network.<sup>11</sup> One commenter claims that to date carriers have not implemented a reason header in the SIP Code 603 response.<sup>12</sup> That is not correct. As mentioned above, AT&T is already including a reason header with SIP Code 603 on- IP end to end call paths for those calls it blocks based on analytics as the terminating provider. This also disproves an assertion that SIP Code 603 with a reason header could prevent mapping between IP and TDM networks,<sup>13</sup> as AT&T has already inserted messages into the header field without causing an issue with network equipment.

Some commenters argue that SIP Code 603 does not provide sufficient information so that the calling party knows whether the call was blocked based on analytics or the potential call recipient, and SIP Codes 607/608 would provide this information.<sup>14</sup> As discussed in more detail below, providers are not required to provide immediate notification when a call is blocked by a potential call recipient as the purpose of the immediate notification is for the calling party to seek redress of legitimate calls that should not be blocked by analytics. The message AT&T has

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<sup>9</sup> USTelecom Comments, p.8.

<sup>10</sup> See, e.g., ABA Comments, p.8; Joint Comments of INCOMPAS and The Cloud Communications Alliance (“INCOMPAS”), p.5.

<sup>11</sup> See also, USTelecom Comments, p.2.

<sup>12</sup> VON Comments, p.4-5

<sup>13</sup> See, e.g., ABA Comments, p.8.

<sup>14</sup> See, e.g., ABA Comments, p.8; NORC Comments, p.4; and, PACE Comments, p. 1-2.

inserted into the SIP Code 603 reason header informs the caller that the call was blocked so the caller can seek redress, if necessary.

SIP Code 603 with an industry-wide standard message in the reason header that the call has been blocked based on analytics would inform calling parties of the reason why the call was blocked and allows them to take immediate action if the call was legitimate, thereby addressing concerns that SIP Code 603 does not provide a reason why the call was blocked. Further, a standardized message in the reason header would also address any concerns that the information in the response might vary from carrier to carrier.<sup>15</sup> Callers need to show why this information is not sufficient.

## **II. SIP CODE 607 IS UNNECESSARY**

SIP Code 607, which is used when the called party indicates that a call is unwanted,<sup>16</sup> is both unnecessary and inappropriate to meet the immediate notification requirement. The Commission recently clarified that the immediate notification requirement only applies to “calls blocked pursuant to analytics programs.”<sup>17</sup> The Commission further explained that the “ultimate purpose of the transparency requirement is to ensure effective redress to callers” and when the called party has initiated the blocking, the caller cannot obtain redress from the voice service provider.<sup>18</sup> The immediate notification requirement thus does not apply to situations where the called party has initiated the blocking, e.g., through customer defined lists, Do Not Disturb, call rejection and/or line blocking. Further, the use of SIP Code 607 raises privacy concerns as it provides the caller with specific information about the called party’s actions to not accept certain

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<sup>15</sup> See, e.g., VON Comments, p.4.

<sup>16</sup> See, e.g., *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Fourth Report and Order, CG Docket No. 17-59 (rel. Dec. 30, 2020), para. 56, fnt 132. See also, e.g., NORC Comments, p.2; VON Comments, p. 2; ABA Comments, p.4; PACE Comments, p.3.

<sup>17</sup> *Reconsideration Order*, para. 30.

<sup>18</sup> *Id.*

calls.<sup>19</sup> The Commission, therefore, should not mandate the use of SIP Code 607 or require similar information that an end user has blocked an unwanted call as part of any immediate notification requirement for blocking.

### **III. FUTURE USE OF SIP CODE 608**

For the reasons discussed above, AT&T strongly believes that SIP Code 603 with an industry standardized reason header message would provide the calling community with actionable information to seek redress if a call blocked by analytics is legitimate. If the Commission nevertheless decides to require providers to use SIP Code 608, it will need to allow time for the associated standards to be developed and providers to implement such standards.

The Commission should allow the work begun by the ATIS/SIP Forum IP-NNI Task Force on implementation of immediate notification codes to conclude.<sup>20</sup> Even those commenters advocating for the use of SIP Codes 607 and 608 now recognize the need for IP-NNI to complete its work on immediate notification codes.<sup>21</sup> The IP-NNI Task Force is currently working on a technical report with recommendations on the use of SIP Code 607 and 608 for immediate notification of call blocking along with consideration of enhancements that could be made to SIP Code 603.<sup>22</sup> AT&T does not oppose VON's suggestion that the standards for immediate notification codes should be finalized by December 31, 2022.

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<sup>19</sup> Reply Comments of USTelecom to Petition for Reconsideration and Request for Clarification of USTelecom – The Broadband Association, CG Docket No. 17-59 (filed June 14, 2021), p.3 (“It would violate consumers’ reasonable privacy expectations to require providers to notify callers when the provider’s subscriber chooses not to accept a particular call or category of calls.”)

<sup>20</sup> See, e.g., Comments of NCTA – The Internet & Television Association (“NCTA”), p. 4-5.

<sup>21</sup> See, e.g., ABA Comments, p.9, fn. 33 (“The IP-NNI Task Force, a joint task force of ATIS and the SIP Forum (an industry association of IP communications companies), has been engaged in developing standards for SIP Codes 607 and 608.”) INCOMPAS Comments, p. 3-4 (“the Commission should determine the current status of the standards development process.”)

<sup>22</sup> A number of commenters suggested that this group send periodic reports to the Commission. This is unnecessary as the ATIS IP-NNI working group is open to the public and Commission Staff often attends these working group sessions.

As recognized by several commenters, if the Commission proceeds with SIP Code 608, providers will need time to implement the new SIP Code in their networks. Once the standards are finalized, the Commission must afford adequate time for vendors to develop software, providers to deploy these changes in their network and ensure appropriate handling of SIP Code 608 including mapping the new SIP Code to ISUP 21 for TDM networks, and test of all network elements to ensure there is no disruption to the voice calling network. NORC has suggested that SIP Codes 607 and 608 be implemented six months after the standards-setting bodies finalize standards for 607/608, however, this will likely not be enough time to implement an entirely new SIP Code in providers' networks.<sup>23</sup> Even assuming that SIP Code 607 is not required and SIP Code 608 does not require the implementation of a JCard,<sup>24</sup> AT&T agrees with USTelecom's previous explanation that it will likely take a year after the standards process has concluded to implement SIP Code 608 throughout providers' networks.<sup>25</sup> Last, but importantly, all this work on implementing a new SIP Code will not significantly enhance caller notification as long as there continues to be a presence of TDM in the call path.<sup>26</sup>

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<sup>23</sup> NORC Comments, p.7.

<sup>24</sup> As explained by TNS, the jCard is an option parameter of SIP Code 608 and would be "exceeding difficult to implement across the telecommunications network." TNS Comments, p. 5-7.

<sup>25</sup> USTelecom Notice of Ex Parte Presentation, CG Docket No. 17-59 (filed Nov. 8, 2021), p.2. ("Indeed, standards-setting processes themselves can take a year or more. Even if the standards process could be accelerated, vendors need to incorporate the new standards into their software and work with service providers to deploy the new releases, including to test and adjust software as needed. Vendors, and not service providers, ultimately are in control of that timeline, which can take nine to twelve months itself.")

<sup>26</sup> USTelecom, p. 3 ("given the continued presence of TDM in providers' networks, any SIP Code 607 or 608 response message (or SIP Code 603 for that matter) that transitions from IP to TDM and back to IP will present as a different message that will no longer be indicative of analytics-based blocking.") See also, NCTA Comments, p.4 ("if a blocked call transits a TDM network or interconnection point, which still occurs for a significant percentage of voice traffic, a 607 or 608 response code would be mapped to ISUP Code 21 (and if the call later passes onto another IP network, remapped to SIP Code 603).")

#### IV. CONCLUSION

SIP Code 603 with an industry standard header message provides calling parties effective information upon which to seek redress if a legitimate call is blocked by a provider based on analytics and can be implemented much quicker than new SIP Code 608. SIP Code 607 is not necessary as the Commission has determined that providers do not need to provide immediate notification for calls blocked at the customer's request. Last, a sufficient implementation period will be required after ATIS IP-NNI have completed their technical report. AT&T looks forward to continuing to work with all stakeholders on a pragmatic and reasonable solution.

Respectfully submitted,

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February 14, 2022